### Exhibit 81

# Board of Directors Presentation: Ethics & Compliance Update

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August 2017



### **Executive Summary**



- There are no significant compliance issues to report.
- We continue to make progress toward several important Ethics & Compliance objectives and to support risk mitigation activities.
  - Commercial Initiatives
    - Partnering for effective Symproic<sup>®</sup> launch, including sampling support
    - Controls around limited Speaker Programs for Hysingla ER and Symproic
    - Changes in call note requirements and associated monitoring
  - Systems and Monitoring
    - New ADD System go-live took place July 25
    - New SOM algorithm expected to be in place late August
- We have met all of our "business as usual" requirements and continuously improved our program.

# We have met all "businessoas" usual" requirements and continuously improved our program



Element	Program Highlights
Compliance Officer & Committees	<ul> <li>Suspicious Order Monitoring Committee routinely meeting and functioning well</li> <li>Sales &amp; Marketing Compliance Committee especially active leading to Symproic<sup>®</sup> launch</li> </ul>
Standards & Procedures	<ul> <li>Creating Purdue Pharma Core Principles (anticipated late August)</li> <li>Re-publishing updated Code of Business Ethics (anticipated early September)</li> <li>Creation of third party vendor code of conduct (anticipated in early Q4)</li> <li>Simplification and update of Sales Force SOPs (anticipated late August)</li> <li>Creation of SOPs for Commercial Operations</li> </ul>
Lines of Communication	<ul> <li>Hotline volume – remains predominantly external inquiries related to medical questions</li> <li>Employee communication regarding Hotline; reminder re non-retaliation practices</li> </ul>
Training & Education	<ul> <li>On deck for roll out: Sunshine Act, Purdue Pharma Code of Business Ethics</li> <li>Creation of training content for new hires and third party vendors underway</li> </ul>
Auditing & Monitoring	<ul> <li>Monitoring of call notes pertaining to OIC, Symproic and competitor topics</li> <li>E&amp;C Ride alongs continue; increase anticipated post Symproic launch</li> <li>Implemented modified free text call note requirements</li> </ul>
Investigations & Disclosures	<ul> <li>Continued investigations into relevant matters</li> <li>Implementing new system to improve efficiency of investigations and remediations</li> </ul>
Enforcement & Discipline	Automating some elements of sales discipline process to ensure consistent enforcement and to maximize efficiency



### Appendix

## Ride Alongs: We are on target to complete roughly 50 ride along monitoring sessions in 2017.



Our vendor, ICC, will complete 30 ride alongs by year end and employed compliance officers will complete approximately 20 additional programs.

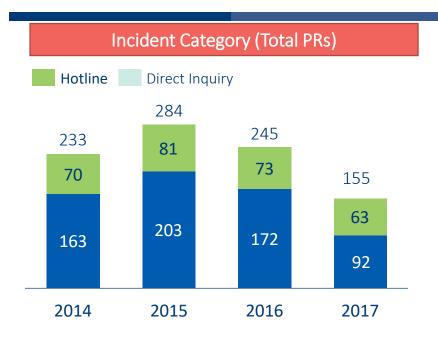
	YTD 2017	
	Combined	<b>2017 ICC</b>
	Total # of	# of Field
ID # Region	Field Days	Days
1710000 Northeast	6	2
1720000 Mid Atlantic	1	1
1730000 Mid West	4	4
1740000 Southeast	3	3
1750000 South Central	4	4
1760000 West	2	2
	20	16

- 16 Field Days completed through June
- Will target 14 remaining field day targets to regions not visited frequently YTD
  - Mid Atlantic
  - West
  - Southeast

		YTD 2017								
		<b>Combined</b>	<u>2017 ICC</u>							
		Total # of	# of Field							
ID#	Region	Field Days	Days	<u>July</u>	<u>August</u>	<u>Sept</u>	<u>Oct</u>	<u>Nov</u>	<u>Dec</u>	ICC Total
1710000	Northeast	6	2							2
1720000	Mid Atlantic	1	1	1	1	1	1		1	6
1730000	Mid West	4	4		1	1				6
1740000	Southeast	3	3				1	1		5
1750000	South Central	4	4				1	1		6
1760000	West	2	2		1	1			1	5
		20	16	1	3	3	3	2	2	30

#### **Investigations and Inquiries: Q22017**





- YTD anonymous report percentage is 13.5% as compared to 42.2% for the market comparator.
   This is up slightly from Q1 (11.8%).
  - For comparison, in 2016, 27% of calls to our hotline were made anonymously vs. market comparison of 40.7%
- Lower than benchmark percentage anonymous calls, indicating trust in the system and the people who manage it
- Anonymous calls are harder to properly and completely investigate. Employing more awareness and anti-retaliation training may empower more employees to identify themselves when the contact the Hotline

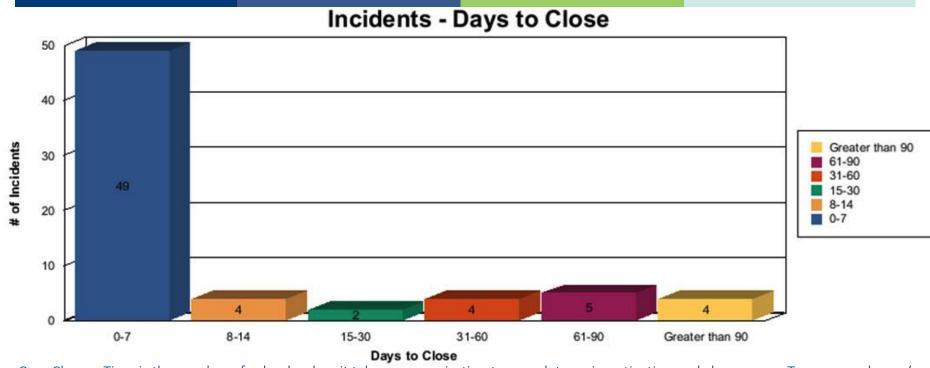
#### INCIDENT REPORT ACTIVITY SUMMARY

	PTD		YTD		YTD Market	
Original Incident Reports	7	%	52	%	Comparison	
Anonymous Reports	1	14.3%	7	13.5%	42.2%	
Non-Anonymous Reports	6	85.7%	45	86.5%	57.8%	
Escalated Incident Reports	0	0.0%	0	0.0%	1.2%	
Previously Reported To Mgmt	0	0.0%	2	3.9%	24.2%	

Leventhal

#### 19-23649-shl Doc 2181-38 Filed 12/21/20 Entered 12/21/20 16:41:46 Investigations and Inquires: Q20f2017 **Case Closure Time**





Case Closure Time is the number of calendar days it takes an organization to complete an investigation and close a case. To earn employees' trust and ensure that they know their concerns are important and are being seriously considered, it is vital that organizations complete investigations in a timely fashion.

Across all industries, our hotline vendor is reporting that the time it takes to close a case is increasing year over year. According to their benchmark data, case closure time in 2011 was a median of 32 days vs. a median of 46 days in 2015.

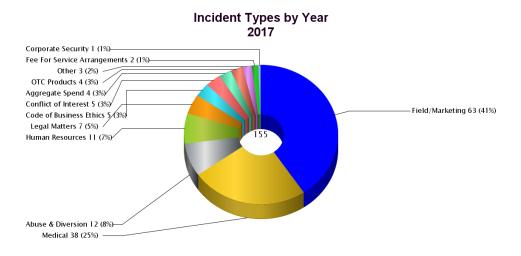
Our average case closure time for 2017 matters through Q2 for 42 days for direct inquiries and 20 days for hotline calls.

Our goal is to meet is case closure in less than 30 days. Of course, the more complex a case, the longer it make take to appropriately remediate and close it out.

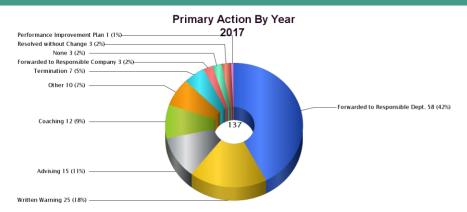
#### Types of Incidents and Actions Taken: Q2 2017



We are running at approximately the same rate for each category as previous years, other than HR matters, where we are slightly higher at this point in the year than in previous years



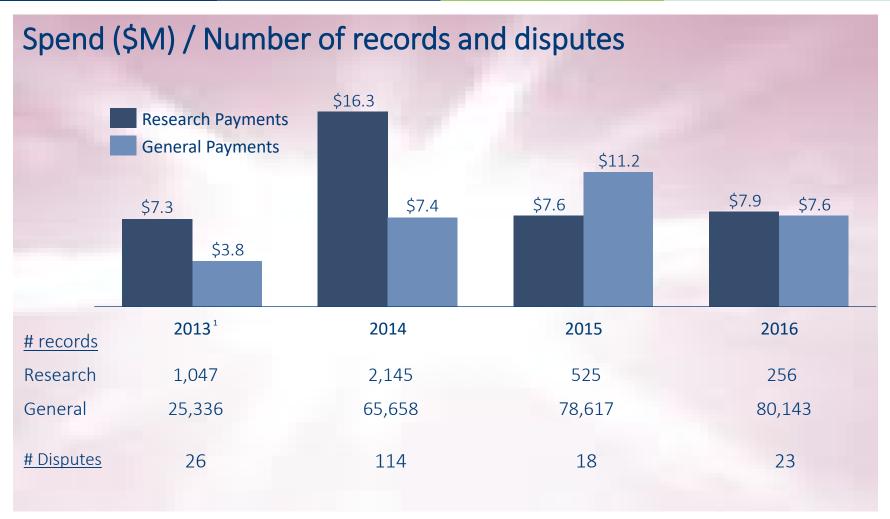
There has been an increase in warning letters to date driven by training failures pertaining to Symproic and sampling.



Note: Graphs represent closed matters only

#### Sunshine Act Summary Data (unchanged since last report)





Note: General Spend includes items such as speaker programs, HCP in-office meals, and HCP fee-for-service contracts. These items will be made public by CMS on June 30, 2017; research Spend is subject to a delay of up to 4 years to preserve confidential research activities

<sup>&</sup>lt;sup>1</sup> Only includes August - December